

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA

v.

IAN FREEMAN, ET AL

)  
)  
)  
)  
)  
)

No. 1:21-cr-00041-JL

**GOVERNMENT’S RESPONSE TO DEFENDANT IAN FREEMAN’S MOTION TO  
AMEND CONDITIONS OF RELEASE**

Ian Freeman moves to amend the conditions of his release. He asserts that “no major problems have been noted by U.S. probation over that period of time” and that he does not present as an individual that will fail to appear. In fact, Freeman flagrantly violated the prohibition on purchasing, selling, or transferring virtual currency, or directing anyone to do so on his behalf.<sup>1</sup> See Government’s Objection to Motion to Modify Conditions of Release, ECF No. 105. In addition, the defendant substantially underreported (by millions of dollars) his assets to the probation department and has yet to disclose the millions of dollars he could use to subsidize his flight. The defendant has friends and associates who have left the country to evade the reach of the United States government.

Finally, a Superseding Indictment has recently been returned adding additional charges, and for the first time alleging that the defendant knowingly assisted fraudsters in laundering proceeds of frauds including romance scams.

---

<sup>1</sup> The basis for this violation is explained in detail in the government’s response to defendant’s previous motion to remove his tracking device. After the government filed its response, the defendant withdrew his previous motion.

Because Freeman remains a flight risk and has not abided by the conditions as currently set, this Court should deny his request to amend or remove any conditions.

Respectfully submitted,

JANE E. YOUNG  
United States Attorney

Dated: May 27, 2022

/s/ Georgiana L. MacDonald  
Assistant U.S. Attorney  
MA Bar # 685375  
53 Pleasant Street, 4<sup>th</sup> Floor  
Concord, New Hampshire 03301  
603-225-1552  
[georgiana.macdonald@usdoj.gov](mailto:georgiana.macdonald@usdoj.gov)

/s/ John J. Kennedy  
Assistant U.S. Attorney  
NH Bar # 19557  
53 Pleasant Street, 4<sup>th</sup> Floor  
Concord, New Hampshire 03301  
603-225-1552  
[john.kennedy2@usdoj.gov](mailto:john.kennedy2@usdoj.gov)

/s/ Seth R. Aframe  
Assistant U.S. Attorney  
53 Pleasant Street, 4<sup>th</sup> Floor  
Concord, New Hampshire 03301  
603-225-1552